

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
NEWARK DIVISION**

MATTHEW TAIBBI,

Plaintiff,

Civil Action No.: 2:25-cv-02275-EP-LDW

v.

SYDNEY KAMLAGER-DOVE,

Defendant.

_____x

DECLARATION OF ROBERT GARSON, ESQ., IN SUPPORT OF ORDER APPROVING
ADMISSION *PRO HAC VICE*

I declare pursuant to 28 U.S.C. 1746:

1. I am a partner of the law firm GS2Law PLLC, whose office is located at 20801 Biscayne Boulevard, Miami, FL, 33180.
2. I am an attorney-at-law and admitted to the Bars of New York, Florida and the District of Columbia.
3. I am, and have been, a member in good standing of the Bars of the State of New York having been admitted in 2010, the State Bar of Florida since 2022, and the Bar of the District of Columbia since 2022. I am admitted to practice before the United States District Court for the Southern District of New York, the United States District Court for the Eastern District of New York, the United States Court of Appeals for the Second

Circuit, the Southern District of Florida the Northern District of Florida and the Court of Appeals for the Federal Circuit. I am, and have been, a member in good standing of the Bar of England and Wales since 1999. I am, and have remained, a member in good standing of said bars at all times, and am not under suspension or disbarment by any Court. There are no disciplinary proceedings pending against me.

4. The roll of the members of the First Judicial Department of the Bar of the State of New York is maintained at 41 Madison Avenue, 26th Floor, New York, NY 10010.

5. The roll of the members of the Bar of the State of Florida is maintained at 651 E Jefferson St, Tallahassee, FL 32399.

6. The roll of the members of the Bar of the State of the District of Columbia is maintained at 901 4th Street, NW, Washington, DC 20001.

7. I submit this Declaration in support of, and in connection with the accompanying Application of Michael Steinmetz, Esq. for an Order approving my admission *pro hac vice*, pursuant to Civ. Rule 101.1(c) of the Local Civil Rules of the United State District Court for the District of New Jersey.

8. I am in possession of the District of New Jersey's Local Civil Rules and have generally reviewed the same.

WHEREFORE, it is respectfully requested that this Court grant my request to appear *pro hac vice* as counsel for plaintiff, Matthew Taibbi, in connection with the above-captioned case.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 3, 2025
New York, NY

By: /s/ Robert Garson
Robert Garson
GS2Law PLLC
20801 Biscayne Blvd., Ste 506
Miami, FL, 33180
305-780-5212
rg@gs2law.com